REMARKS

Claims 1-46 are currently pending in the subject application and are presently under consideration. Claims 1-4, 7, 14-16, 18, 19, 26-32, and 37-42 have been amended herein as shown at pages 2-9 of this document. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I.   Objection of Claims 26 and 39

Claims 26 and 39 stand objected to due to minor informalities. Claims 26 and 39 have been amended herein to correct such minor informalities.

II.   Rejection of Claims 1-5, 11-15, 18-20, 24-28, 30-32, 35-38, and 45-46 Under 35 U.S.C. §103(a)

Claims 1-5, 11-15, 18-20, 24-28, 30-32, 35-38, and 45-46 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bloomfield (U.S. 6,370,552) in view of Bates *et al.* (U.S. 6,374,272). Reconsideration and allowance of these claims is respectfully requested for at least the following reasons. Neither Bloomfield nor Bates, *et al.*, alone or in combination, disclose, teach, or suggest all limitations as recited in the aforementioned claims.

> To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. *See In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

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In particular, independent claims 1, 14, 27, and 37 have been amended herein state that a *client device displays definitional information... relating to a selected element... on a page.* The subject invention as recited in the independent claims allows a user to obtain *definitional information* relating to a *selected element on a page*, wherein such information is obtained *via creating a communication channel in response to selecting the element.* For example, a user reading technical information can be unaware of a meaning of a term or set of terms within such technical information. The user can then *select* one or more of these terms, causing *a communication channel* to be created. Thereafter, *data indicative of the selected element* is delivered over the communications channel to a second computer, which can thereafter locate/deliver *definitional data* to the client. Such *definitional data* can then be *displayed on the page on a client device.*

Bloomfield <u>nowhere</u> discloses, teaches, or suggests that a *client device displays definitional information...related to a selected element... on a page.* Rather, Bloomfield discloses a system and/or method that enables an executing application to be viewed on an HTML page. Furthermore, Bloomfield does not disclose that the viewing of the executing application is initiated *via* selecting an element on a page and that the executing application is viewable on the same page. Rather, Bloomfield states that display of an executing application "begins by receiving an input from a user which signals that the user wants execution of an application program to begin." *See* col. 2, lines 25-28. It is not indicated that the input from the user is related to selecting an element on a page, as is recited in the subject claims. Furthermore, Bloomfield is directed at illustrating *an executing application* within an HTML page, and does not teach or suggest *displaying definitional information... relating to a selected element... on a page* as claimed.

Bates, *et al.*, like Bloomfield, does not disclose, teach, or suggest *a first computer displaying on a page definitional information relating to at least one selected element* as recited in the subject independent claims. In contrast, Bates, *et al.* teaches systems and methodologies that utilizes an input region defined with respect to a hypertext link for receiving user input for such hypertext link. This user input is received outside a display region to perform a predetermined operation with such link, thereby allowing a user to perform a predetermined operation (*e.g.*, selecting a hypertext link) when a pointing

mechanism is proximate to, but not directly over, the hypertext link. Accordingly, Bates, *et al.* is not related to retrieval and *display of definitional information relating to a selected element* as claimed.

With respect to dependent claims 2, 15, 28, and 38, contrary to the Examiner's assertion, Bloomfield <u>does not</u> disclose, teach, or suggest *creating a container on a page... to display the definitional information* as claimed. The Examiner has cited a portion of Bloomfield that discloses building a protocol stack, and packaging protocol drivers together with the protocol stack to create a "container." (*See* col. 6, lines 14-22). However, Bloomfield <u>nowhere</u> discloses that *the container displays definitional information* as recited in these claims. Rather, the "container" of Bloomfield is not utilized to display any sort of data, as it is simply a packaging mechanism for packaging a protocol stack with corresponding drivers. The Examiner is reminded that applicants can be their own lexicographer, and that Bloomfield's utilization of the word "container" to describe a package of data does not teach or suggest utilization of *a container to display definitional information* as recited in the aforementioned claims.

> Applicant may be his or her own lexicographer as long as the meaning assigned to the term is not repugnant to the term's well known usage. *In re Hill*, 161 F.2d 367, 73 USPQ 482 (CCPA 1947). Any special meaning assigned to a term "must be sufficiently clear in the specification that any departure from common usage would be so understood by a person of experience in the field of the invention." *Multiform Desiccants Inc. v. Medzam Ltd.*, 133 F.3d 1473, 1477, 45 USPQ2d 1429, 1432 (Fed. Cir. 1998).

As described in the specification and associated figures, the term *container* as utilized in the claims can be interpreted as a particular portion of a page that can *display definitional information*. "If the user makes a proper selection, the active glossary function dynamically inserts a container 72 for enclosing and displaying selected information at a position on the document." (*See* page 8, lines 8-9, and Fig. 1b). The "container" disclosed in Bloomfield is simply a data package that is not intended for utilization as a display region for *definitional information*.

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In view of the above-described discrepancies between the subject invention as recited in the subject claims and teachings of Bloomfield and Bates, *et al.*, it is readily apparent that this rejection should be withdrawn.

III.   Rejection of Claims 6 and 21 Under 35 U.S.C. §103(a)

Claims 16 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bloomfield in view of Bates, *et al.* in view of Guedalia (U.S. Patent 6,356,283). Withdrawal of this rejection is respectfully requested for at least the following reasons. Guedalia discloses a system and/or method for monitoring location of a pointing device in hidden sub-regions to assist in embedding images and delivering HTML pages to a client. Guedalia does not disclose, teach, or suggest *displaying definitional information... relating to a selected element... on a page* as recited in independent claims 1 and 14 (which claims 6 and 21 depend from). Accordingly, this rejection should be withdrawn.

IV.   Rejection of Claims 7-9, 16-17, 22, 29, 33, and 39-43 Under 35 U.S.C. §103(a)

Claims 7-9, 16-17, 22, 29, 33, and 39-43 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bloomfield in view of Bates, *et al.* in view of Cordell (U.S. Patent 6,031,989). Cordell does not make up for the aforementioned deficiencies of Bloomfield and Bates, *et al.* – accordingly, withdrawal of this rejection is respectfully requested.

V.   Rejection of Claims 10, 23, 34, and 44 Under 35 U.S.C. §103(a)

Claims 10, 23, 34, and 44 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bloomfield in view of Bates, *et al.*, in view of Cordell in view of Anderson (U.S. Patent 6,363,398). Anderson, like Cordell, does not make up for the deficiencies of Bloomfield and Bates, *et al.* Therefore, it is readily apparent that this rejection should be withdrawn.

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CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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